



600 B Street, Suite 1900
San Diego, CA 92101
619.525.3990 phone
619.525.3991 fax
www.robbsinarroyo.com

March 9, 2016

VIA ECF

Honorable Jose L. Linares, U.S.D.J.
United States District Court
Martin Luther King Building & U.S. Courthouse, Room 5D
50 Walnut Street
Newark, NJ 07101

Re: *In re: Liquid Aluminum Sulfate Antitrust Litigation*, 16-md-2687 (JLL) (JAD)

Dear Judge Linares:

Please accept this letter as my application for a position on plaintiffs' steering committee in the above-captioned litigation. My firm, Robbins Arroyo LLP ("Robbins Arroyo"), is co-counsel for East Valley Water District, a California Special District that provides water and wastewater services to 101,733 residents within its 27.7 square mile service area, including, but not limited to, the City of Highland, eastern portions of the City of San Bernardino, the San Manuel Band of Mission Indians, Patton State Hospital, and portions of unincorporated County of San Bernardino. My firm resume is attached as Attachment A.

Please also accept this letter as support for the appointment of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as lead counsel for plaintiffs and for the appointment of Robbins Geller Rudman & Dowd LLP to plaintiffs' steering committee. Both of these firms have substantial expertise and a record of success in complex antitrust class actions. Moreover, both of these firms have a depth of class action and antitrust leadership experience, making them the most appropriate candidates to best serve the interests of the proposed class.

This MDL will inevitably entail coordination by and between plaintiffs' counsel, prosecutors, and various U.S. government agencies. As a former Assistant U.S. Attorney, I have ample experience in cases that required coordination with parallel criminal and regulatory proceedings. Before joining Robbins Arroyo, I spent seventeen years as an AUSA with the U.S. Attorney's Office in San Diego, including specifically as a trial lawyer for the Financial Institution Fraud Task Force and the Major Frauds Sections. I led grand jury investigations and indicted and tried complex white collar criminal cases involving corporate, securities, bank, investor, tax, foreign currency and bankruptcy fraud, bank bribery, and money laundering, among others.

I have devoted my practice at Robbins Arroyo to representing aggrieved classes and have a record of success in resolving high-profile shareholder derivative and class actions,

In re: Liquid Aluminum Sulfate Antitrust Litig.

March 9, 2016

Page 2

including antitrust matters. For example, I led the firm's efforts as part of a team of plaintiff firms, including Robbins Geller Rudman & Dowd LLP serving as lead counsel with two other firms, in a high profile, antitrust class action against several private equity firms. The case involved allegations of conspiracy among defendants to rig bids, restrict the supply of private equity financing, fix transaction prices, and divide up the market for private equity services for leveraged buyouts. My firm played a prominent role in this litigation, bearing the responsibility for building the case against a principal defendant, one of the largest private equity firms in the world. The defendants settled for more than \$590 million. *Dahl v. Bain Capital Partners*, No. 1:07-cv-12388 (WGY) (D. Mass. filed Dec. 28, 2007).

Robbins Arroyo is a nationally recognized complex litigation firm dedicated to plaintiff representation in shareholder rights, securities, antitrust, Employee Retirement Income Security Act (ERISA), whistleblower, consumer, and employment matters. For its achievements, Robbins Arroyo has received numerous accolades, including Top 25 Boutique in California (Daily Journal, 2015), Litigation Boutiques Hot List Honoree (National Law Journal, 2012), and Leading Firm in Merger and Acquisition Litigation (Legal 500, 2013-2015). Fourteen of Robbins Arroyo LLP's attorneys were honored to Super Lawyer 2016 lists and three of the firm's partners, including myself, were named to its list of Top 50 attorneys in San Diego.

I, and Robbins Arroyo, have worked cooperatively with a number of the firms who have filed actions in this MDL, and I will work with all counsel in a cooperative and efficient manner. I look forward to serving in this matter as the Court deems appropriate.

Sincerely,

s/ George C. Aguilar

George C. Aguilar
*Attorney for Plaintiff East Valley
Water District*

cc: All Counsel of Record (via ECF)